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February 28, 2008

#### **By Federal Express**

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, D.C. 30554

Attn: Chief, Media Bureau

Re: Hayneville Telephone Company, Inc.'s Annual 47 C.F.R. § 64.2009(e)

**CPNI Compliance Certification** 

EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Hayneville Telephone Company, Inc., we submit the original and four (4) copies of the above-referenced annual CPNI Compliance Certification. We have also filed a copy of this Certification electronically in EB Docket No. 06-36 and have provided two (2) courtesy copies to the Commission's Enforcement Bureau and one (1) copy to Best Copy and Printing, Inc., as required under the Commission's Public Notice, DA 08-171 (released January 29, 2008).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.

Dana H. Billingsley

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Enclosure

cc: Evelyn Causey

FCC Enforcement Bureau Best Copy and Printing, Inc.

#### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

#### EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 28, 2008

Name of company covered by this certification: Hayneville Telephone Company, Inc.

Form 499 Filer ID: 807051

Name of signatory: Evelyn Causey

Title of signatory: CFO

In response to the Commission's Public Notice, DA 08-171 (released January 29, 2008), Hayneville Telephone Company, Inc. states as follows:

I, Evelyn Causey, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, as set forth in 47 C.F.R. §§ 64.2001, et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in sections 64.2001, et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed Chulz P. Causley

# Before the Federal Communications Commission Washington, D.C. 20554

## ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF HAYNEVILLE TELEPHONE COMPANY, INC.

#### EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Hayneville Telephone Company, Inc., ("Hayneville") files the following statement of compliance with the requirements set forth in 47 C.F.R. §§ 64.2001, et seq. on behalf of Hayneville:

- 1. I have personal knowledge that Hayneville has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
- 2. I have personal knowledge that Hayneville obtains written approval for the use of its customers' CPNI and that Hayneville has notified its customers of their right to restrict Hayneville's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
- 3. I have personal knowledge that Hayneville has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. §§ 64.2001, *et seq.* and that Hayneville has an express disciplinary process in place to deal with breaches of CPNI.
- 4. I have personal knowledge that Hayneville implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
- 5. I have personal knowledge that Hayneville maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Hayneville retains all such records for a minimum period of one year.
- 6. I have personal knowledge that Hayneville has established a supervisory review process regarding Hayneville's compliance with outbound marketing situations and that

Hayneville maintains records of such compliance for a minimum period of one year. Hayneville's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Hayneville has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this <u>21</u>st day of February, 2008.

HAYNEVILLE TELEPHONE COMPANY, INC.

By:

Evelyn Causey

CFO